

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

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	:	
SHEA DEVELOPMENT CORP., BRAVERA,	:	
INC., and IP HOLDING OF NEVADA CORP.,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	Civil Action No. 07-CV-11201 (DLC)
	:	
CHRISTOPHER WATSON and ELIZABETH	:	
ANNE CONLEY,	:	
	:	
Defendants.	:	
-----X	:	

**NOTICE OF MOTION OF DEFENDANT CHRISTOPHER WATSON  
TO DISMISS FOR LACK OF SUBJECT MATTER JURISDICTION**

PLEASE TAKE NOTICE, that upon the accompanying memorandum of law, and upon all the pleadings and prior proceedings heretofore had, served and/or filed herein, defendant Christopher Watson, by his undersigned counsel, will move this Court, before the Honorable Denise L. Cote, U.S.D.J., S.D.N.Y., located at The United States Courthouse, 500 Pearl Street, New York, New York 10007, on a date and time to be determined by the Court, for an order:

- (a) dismissing with prejudice the claims brought by Shea Development Corp., Bravera, Inc., and IP Holding of Nevada Corp., filed December 12, 2007, pursuant to Rules 12(b)(1) and 12(b)(6) of the Federal Rules of Civil Procedure for lack of subject matter jurisdiction; and
- (b) granting such other and further relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE, that pursuant to Local Civil Rule 6.1(b)(2) of the Local Rules of the United States District Court for the Southern District of New York, any opposing affidavits and answering memoranda of law shall be served within ten business days after service of the moving papers.

Respectfully submitted,

CHRISTOPHER WATSON

By his attorneys,

/s/ Jeffrey A. Simes

Jeffrey A. Simes (JS-7060)

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Dated: January 14, 2008

**CERTIFICATE OF SERVICE**

I hereby certify that these documents, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent via first-class mail postage pre-paid to those indicated as non-registered participants on September 13, 2007.

/s/ Jeffrey A. Simes

Jeffrey A. Simes (JS-7060)

Dated: January 14, 2008